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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 IN RE: TERRORIST ATTACKS ON
5 SEPTEMBER 11, 2001,

6 03 MD 1570 (GBD) (SN)

7 -----x
8 New York, N.Y.
9 September 6, 2023
2:40 p.m.

10 Before:

11 HON. SARAH NETBURN,

12 Magistrate Judge

13 APPEARANCES

14 COZEN O'CONNOR
15 Attorneys for Plaintiffs
BY: SEAN CARTER

16 KREINDLER & KREINDLER, LLP
17 Attorneys for Plaintiffs
BY: MEGAN BENETT
18 STEVEN POUNIAN
JUSTIN GREEN

19 ANDERSON KILL P.C.
20 Attorneys for Plaintiffs
BY: JERRY GOLDMAN
21 ALEX GREENE
22 BRUCE STRONG
JEREMY SHOCKETT

23 SPEISER KRAUSE
24 Attorneys for Plaintiffs
25 BY: JEANNE M. O'GRADY

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1 BAUMEISTER & SAMUELS, P.C.
2 Attorneys for Plaintiffs
3 BY: DORTHEA M. CAPONE

4 BARASCH & MCGARRY
5 Attorneys for Plaintiffs
6 BY: BRUCE KAYE

7 MOTLEY RICE LLC
8 Attorneys for Plaintiffs
9 BY: ROBERT HAEFELE
10 DONALD MIGLIORI
11 JODI FLOWERS
12 JOHN EUBANKS
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(Case called)

MR. O'GRADY: Jeanne O'Grady, Speiser Krause.

MS. BENETT: Good afternoon. Megan Bennett on behalf of Ashton plaintiffs from Kreindler & Kreindler.

MS. CAPONE: Good afternoon, your Honor. Dorothea Capone for the Bowers/Ashton plaintiffs.

MR. POUNIAN: Steven Pounian for Ashton, Kreindler & Kreindler.

MR. GREEN: Justin Green for Ashton, Kreindler & Kreindler.

MR. KAYE: Good afternoon, your Honor. I'm Bruce Kaye appearing for Barasch McGarry. We represent the latent injury cases.

THE COURT: Thank you.

And who do we have here from the PECs?

MR. MIGLIORI: Good morning, your Honor, or good afternoon. Don Migliori from Motley Rice on behalf of the wrongful death plaintiffs.

MS. FLOWERS: Good morning, your Honor. Jodi Flowers on behalf of Burnett and PEC.

MR. EUBANKS: Good afternoon, your Honor. Robert Haefele from Motley Rice also for PEC and Burnett plaintiffs.

MR. GOLDMAN: Jerry Goldman from Anderson Kill on behalf of PEC and the O'Neil plaintiffs. Also with me are Bruce Strong, Alex Greene, and Jeremy Shockett.

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1 MR. CARTER: Good afternoon, your Honor. Sean Carter
2 from Cozen O'Connor for the PECs and Federal Insurance
3 plaintiffs.

4 MR. EUBANKS: And John Eubanks from Motley Rice for
5 the Burnett plaintiffs and not necessarily for PEC.

6 THE COURT: Great. All right. Thank you all.
7 Apologies for our late start. We had some technical
8 difficulties, but it's nice to see you all. I hope everyone
9 had a good summer.

10 We are here to talk about mostly administrative
11 issues. So let me talk about the initial reason we scheduled
12 this conference which is to talk about quality control, making
13 sure our forums are working as best as they can. And then
14 secondly we'll talk with the common benefit fund scheduling
15 issues.

16 So let me just give you a bit of a perspective because
17 I received a letter from Motley Rice, dated September 1st
18 making the reasonable claim that the issues that we raised that
19 caused our concern in that one order were really a fraction of
20 the cases. There are 40 or 50 lawyers in this room here.
21 There's one of me and one of my law clerk, and we handle every
22 single filing that comes in the court. I think you all know
23 that from the grace of the Court of Appeals, we have one law
24 clerk who works on this matter full time. It is her full-time
25 job. She doesn't do anything else but work on this case, and

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1 that occupies more than a full-time docket for her. It's an
2 enormous lift for us to manage these cases correctly,
3 efficiently. We are dedicated to it. We take a lot pride in
4 what we do, but it is not easy because there are thousands and
5 thousands of individual cases, as I know you all know. When I
6 explain to my colleagues how big this case is, they don't
7 totally appreciate the volume we're talking about here. Each
8 individual plaintiff gets time in our mind and on our desk.

9 So although the numbers that we talked about that
10 caused us to have this order may seem de minimis. For one, to
11 find those 15 plaintiffs that were a mistake is hours and hours
12 of work. And two, we are doing hours of work for every single
13 one that comes through to make sure that we are satisfied that
14 they're not mistakes of various forms.

15 And so part of the reason why we wanted to schedule
16 this conference was because we think there may be tweaks we can
17 do to some of the form applications that the parties file to
18 help us with our quality control efforts.

19 I think that there are two different types of issues
20 that we are seeing generally. You could argue it's three, but
21 in my mind they are sort of filing problems. And then there
22 are what I'm calling the QC problems, the quality control
23 problems.

24 On the filing list, we are seeing lawyers who are
25 filing things sort of inconsistent with the local rules, using

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1 event codes on ECF that are not the correct events codes that
2 they are not conscientious about the proceedings on ECF. By
3 that I mean, for example, they file something, maybe the
4 clerk's office sends a defect notice and that is not being
5 acted on. The lawyers are not following up to make sure things
6 are happening, which means that when we then go and look at the
7 motion a couple months later we see that we are missing
8 documents where there has been an error notice that hasn't been
9 corrected. For every one of those, if you multiply that, it's
10 just an enormous amount of work.

11 So the first area that I want to try to focus on are
12 these filing issues. That's what led me to think maybe some
13 training will be helpful. It turns out that's not a resource
14 we have access to. One proposal may be that we come up with a
15 checklist to make sure that lawyers are doing everything in the
16 right order.

17 The second issue is what we are calling the quality
18 control issue. And it's in part reflected by those few
19 examples we gave. When we get a filing for a default motion,
20 we are looking to make sure the plaintiff is a plaintiff. We
21 know who is the decedent, it's not the plaintiff. We
22 understand how that person died, meaning some decedents are
23 9/11 decedents, meaning the day of. And some decedents are
24 people who have latent injuries and deceased 10 or 15 years
25 later.

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1 We are having state law questions, which we've raised
2 in a couple orders recently. We're trying to figure out what
3 state law would govern. All of that sort of work is also a
4 big, big lift if you multiply it by the tens of thousands of
5 plaintiffs that we have.

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1 THE COURT: The exhibits, I understand that there's a
2 practice of using an Excel format, to identify the associated
3 filings so this person is a plaintiff because here is a docket
4 number and the page number of an 800-page complaint where that
5 person is identified, trying to track all that down, trying to
6 track all of that down is an enormous lift.

7 And then the third area we're putting the quality
8 control area is this issue about the duplication, which has not
9 been a huge problem. I think most of our efforts have really
10 addressed that concern, but not a hundred percent. And we want
11 to make sure that everybody is on the same page about what
12 needs to happen and make sure that this master list that I
13 understand Motley Rice has sort of ownership on is being
14 utilized by everybody. And one way to make sure that's
15 happening is to require some sort of certification that these
16 plaintiffs are in the master list, and I'm satisfied that there
17 are no other pending motions or prior judgments entered on
18 behalf of those plaintiffs.

19 So those are the types of issues that we are seeing
20 and that led us to think that it is a good use of your time to
21 come in today so that we can talk about it.

22 Like I said, I read the letter that was filed at
23 ECF 9319, September 1st. From that letter, it seemed like
24 there were two proposals; one which I absolutely endorse, which
25 is that everybody use this clearinghouse resource and to make

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1 sure that, whether it be a lawyer representing 10,000 people or
2 a lawyer representing two people, that that information is in
3 the clearinghouse and that you are accessing that resource to
4 make sure that there is certainty about the filing.

5 The second was a proposal for a working group to
6 address this issue. In advance of today's conference, I
7 thought about whether that would be a helpful thing. My
8 current view is that we know what we want, and rather than ask
9 you to predict what would help us, it might be the best way for
10 us to move forward for us to take the first cut at what we
11 think would be helpful. And it might look like a checklist
12 that people are doing internally, that we don't ever see, make
13 sure the filing needs to be filed in the correct order,
14 something akin to a civil cover sheet that identifies the type
15 of information with specificity that we need, and that includes
16 the kinds of certifications that we are seeking.

17 So I think -- although I will hear your views -- my
18 current thinking is that it makes sense for us to try to come
19 up with a form that we think would work. We are very much
20 interested in your views, because you are doing the work and we
21 want to make sure that what we are asking for is what you can
22 also provide to us or maybe you think there's a better way to
23 get us the information. So that's where I am.

24 I'm happy to hear from whoever. I don't know whether
25 Mr. Eubanks wants to start, as the author of the letter.

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1 MR. EUBANKS: I'm happy to start. And I'm sure others
2 will chime in. We know this is a huge task. We know that your
3 Honor and your staff have been looking at the motions very
4 closely to ensure that those quality control measures are met
5 and of course to offer an apology for the mistakes that have
6 been made.

7 In terms of the quality control issue that you have
8 raised, I think one of the issues on the checklist, I think
9 that's a fantastic idea. I'm not sure -- we have counsel who
10 is probably in this courtroom right now, because most of the
11 counsel who are in here have filed a lot of these motions over
12 the past few years -- it may be some of the later cases that
13 are having some of the issues, following such a checklist would
14 likely be an appropriate measure to ensure that you are getting
15 what you need and certified that they are going through that
16 correct list before they file the motion.

17 In terms of making access to the clearinghouse lists,
18 we're trying to devise a way to make that accessible to
19 everyone, but not editable by everyone. I don't want everyone
20 to be able to go and edit that list. At a time we are going
21 through and seeing what is missing, we rather they bring it to
22 our attention so there's only one party drafting that document.
23 We are trying to determine the best way to make that available
24 to all counsel, all plaintiffs counsel in the case, anyone who
25 has filed a case against Iran, the Taliban or any of the

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1 parties in this case as we move forward in these default
2 judgments.

3 One thing we had not been doing -- and based on your
4 Honor's order -- has been to try to create that pending motion
5 list. Often when the motions would come in, the motions for
6 default judgment, they would come in in such a flurry, we had
7 overlap in a lot of those motions, because we would have
8 plaintiffs who were plaintiffs in multiple cases who were
9 responding to counsel in multiple cases. And unfortunately,
10 each firm would file within about a five-day time period and
11 you would have multiple motions with the same names on them.
12 The pending motion list will hopefully be able to alleviate
13 that. That was not something that had been kept previously.
14 It will be a difficult thing, because, as your Honor has noted,
15 the thousands of names we're dealing with and the number of
16 different plaintiffs' counsel in this case, it becomes very
17 difficult to aggregate that information in one place. But we
18 will do our very best to make sure that is the case and make it
19 accessible to everyone.

20 THE COURT: So let me ask you a question.

21 MR. EUBANKS: Sure.

22 THE COURT: One thought I had would be, before you
23 file something, you being John Smith lawyer, that you would
24 certify that both the motion that you are about to file is
25 listed on the master list and that you have confirmed that that

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1 party doesn't have any prior judgments or pending motions. It
2 sounds like what you are saying is that that job was too hard
3 to keep up with in real time.

4 MR. EUBANKS: That may be difficult to keep up with in
5 real time, especially given the size of some of these motions
6 that are being filed, the number of plaintiffs that are being
7 filed. There is already a large amount of work that goes into
8 reviewing the lists to ensure that the names are on the list as
9 plaintiffs, that there's not a judgment entered already. That
10 part of the work is being done. Unfortunately, because
11 sometimes these motions cross each other, it is difficult for
12 the pending motion list to be consulted at all times.

13 But as I said, that hasn't been a focus. The focus
14 has generally been on the judgment. And the focus is to change
15 over to is there something pending on this person, not just has
16 a judgment been entered. And that will hopefully alleviate
17 some of this issue that the Court is encountering.

18 In terms of the civil cover sheet issue, I wasn't
19 quite following, because I noted the civil cover sheet be filed
20 in the new case, but in terms of filing the motion, I was
21 trying to understand what the Court would be envisioning with a
22 civil cover sheet.

23 THE COURT: I was using that as an example, that's
24 plain, but the idea being that, as the first page of your
25 motion, you will be required to submit some sort of a cover

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1 sheet that gave us the information that we would be looking for
2 when we do our work on our end. So identify the complaint and
3 the page number where this person is listed as a party,
4 identify the decedent, if it's a damages claim, and when that
5 person died, identify the relevant state law that you are
6 seeking to apply in that instance, so that type of information.
7 Because trying to locate that information for each individual
8 plaintiff can take a couple of hours. And if you multiply that
9 out, there's not as many hours in the year.

10 MR. EUBANKS: That makes much more sense.

11 And in terms of just looking at, for example, the
12 motion that had been filed against the Taliban, that's one I
13 can speak most directly about, we tried to divide up the
14 exhibits as to under which law we were suing, but of course,
15 when it comes to the common law claims, we have not laid out
16 the individual state law issue, as the Court has noted more
17 recently in the Iran judgment. So that is something that we're
18 all going to have to work a little bit more on in terms of
19 coordinate how to present to the Court the state common law
20 claims and which state common laws would apply in each of those
21 instances.

22 THE COURT: That was an issue that came up, but I
23 think a little further back, we also had this issue where we
24 were seeking damages for latent injury decedents and it took us
25 a long time in reviewing that application. It wasn't a

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1 traditional 9/11 decedent in the 9/11 context, but it was
2 somebody who passed away 10 or 15 years later, that legal claim
3 had not yet been adjudicated, and so that claim just sort of
4 slid in with the rest of them. And that's the kind of thing
5 that keeps us up at night -- not because people are being
6 nefarious, I'm not accusing anybody of doing anything tricky --
7 I want to make sure when we're issuing billion dollar judgments
8 we're doing it appropriately under the law. That was another
9 example where we felt like we need to make sure people are
10 giving us the information, we're not spending five or ten hours
11 on the case, and wait a minute, this is as to whether or not
12 damages are available for those types of family members.

13 MR. EUBANKS: And that makes perfect sense. That was
14 something we did address in the letter from last Friday, that
15 was for the latent injury claims, it may make sense for the
16 Court to have a date of death and whether or not they are a
17 latent submission. That would be something that is helpful for
18 your Honor on the claims related to these latent injury claims.
19 So we are in agreement that that is something that needs to be
20 addressed.

21 I can say the motion that we filed against Taliban,
22 Exhibit B, which covers our death claims, all of those death
23 claims were day of, 9/11 death claims and not latent injury
24 death claims.

25 THE COURT: Again, I know you are all familiar with

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1 it, the idea of a cover sheet would be just for us to solicit
2 the type of information that we're already looking for, rather
3 than having to dig for it, so that's the idea.

4 MR. EUBANKS: Of course. Your Honor, you are in the
5 best place to determine what it is that you need, and we will
6 do whatever it is that is going to be helpful, because just the
7 breadth of these cases has to be really overwhelming for the
8 Court and your staff, so anything we can do to make your life
9 easier --

10 THE COURT: Cookies, send us cookies. I'm kidding.
11 Don't send cookies.

12 So like I said in the beginning, I do think we have a
13 sense of what we want. I think rather than asking you to
14 predict it, I think it does make sense for us to take the first
15 cut. So I think what we'll probably do in the coming,
16 hopefully, next week or two, issue an order with an exhibit,
17 issue an order for a proposal of these types of forms, and then
18 have some schedule to meet-and-confer and think about whether
19 there's something better or worse that can be provided to us.
20 But at least then you know what it is we want and we can go
21 from there. I think that makes more sense than forming some
22 sort of ad hoc working group. There's no magic here. I don't
23 need you trying to predict what you need.

24 MR. EUBANKS: I think the ad hoc working group, it was
25 an idea that was discussed between the various firms that, as I

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1 said, we consulted prior to filing that letter to make sure we
2 weren't stepping on anyone's toes, make sure we were all in
3 accordance, that group. We represent such a large
4 representative of the death injury claimants, we thought it was
5 a good core to present things to the Court.

6 THE COURT: It does seem -- as well as Anderson Kill
7 has done some helpful work -- I do think those firms should
8 weigh in as we think about next steps going forward.

9 MR. EUBANKS: And again, your Honor had asked one of
10 the things that may be helpful is to provide the Excel files
11 that underly the exhibits, of course, I think we're all happy
12 to provide those.

13 THE COURT: I think my understanding is that those are
14 often provided, but not always provided. And they are helpful
15 to us, so I think that's going to be something that we want to
16 put in both sort of internal checklists that a lawyer consults
17 before she files something, as well as the cover sheet that's
18 submitted to us to confirm that that information is there.

19 MR. EUBANKS: And one last thing that I did address in
20 the letter to some extent, but I think there was a lot in
21 there, is on the overall clearinghouse list, one of the issues
22 we have had is information that is very difficult to format
23 into the working spreadsheets that we have. It is extremely
24 helpful for us, when we're trying to collate this information
25 into one place, to have a specific breakdown of fields so that

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1 we can really just dump the information in and not have to do a
2 lot of back of the house type work. As the Court knows,
3 there's a lot going on at various times in this litigation --
4 right now being one of those times -- and having all of us work
5 together to provide the information in a standardized format
6 would be extremely helpful for everyone, for reviewing these
7 lists and also to submit that information.

8 THE COURT: How do they convey this information to
9 you; this is the name of my party, this is the name of the
10 decedent?

11 MR. EUBANKS: When a new case has been filed, what we
12 have generally done is send out a spreadsheet that has fields
13 as the spreadsheet currently exists and ask the counsel to
14 populate that spreadsheet. Oftentimes, it comes back in their
15 own format, their own spreadsheet format and it's difficult for
16 us to unravel and takes a significant amount of time, depending
17 on how many people are on the individual complaint. So it
18 becomes a time consuming venture that stops being helpful to
19 the parties when it's very difficult to keep up to date on the
20 various plaintiffs who are in the case.

21 THE COURT: So making sure that everybody is using
22 your standardized form.

23 I'm assuming the ship has sailed on this, but I would
24 think that there's some sort of program, an online program
25 where people could fill out information and it would

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1 automatically populate into a database. But maybe at this
2 point, 22 years later, it's not really something --

3 MR. EUBANKS: I think when we cracked into the over
4 five digits of individual plaintiffs, it became a little bit
5 more difficult to do that. It's always possible to create that
6 type of input. But a lot of times, if the list is long,
7 someone is not going to want to go through and put that data
8 entry into each one. But if they can send the information in
9 the fields that we're asking, then it just makes sense, a lot
10 easier to convey to everyone and to make that information
11 accessible.

12 THE COURT: Before we switch to the common benefit
13 fund, anyone want to be heard on this issue?

14 Like I said, we're going to take the first crack at
15 it. We'll issue an order that will have as exhibits to the
16 order proposals of what we're thinking and we'll solicit
17 feedback from you all.

18 The next topic is with respect to the common benefit
19 fund. And I think all that we need to do at this point is to
20 set some deadlines. What I am hoping for is to get information
21 from both Havlish counsel and folks who are opposing making a
22 payment, information about amount of money that people have
23 collected. I guess you can give me that information either
24 way, either my client received a certain amount or as lawyers
25 the amount of hours people have worked. My goal here is to

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1 serve equity, and so I'm hoping -- I'm not that optimistic --
2 but I'm hoping we can work through this without too much angina
3 from everybody and then I can get some information to help me
4 think about what is the most equatable way to move forward on
5 this issue.

6 Yes.

7 MR. PANTAZIS: Dennis Pantazis on behalf of the
8 Havlish plaintiffs.

9 We have met before this conference with leaders from
10 the other firms and we agree with you that we want to get
11 structure done and put together, the parties -- and correct me
12 if I'm wrong -- have a request that we can be given 90 days to
13 see, one, if we can't resolve the issue and, two -- for
14 something to present back to you as a resolution -- or two, to
15 have a roadmap of information that you would want, how we could
16 get it to you. I think that we believe that we probably need
17 to do a lot of the meet-and-confer. We have a meeting next
18 week to try to do that and hopefully take some of the time
19 constraints off the Court on this issue, but we would like 90
20 days to try.

21 THE COURT: Yes.

22 MR. MIGLIORI: Don Migliori for the wrongful
23 death/personal injury plaintiffs.

24 Your Honor, there's a lot of information that we'd
25 like to streamline for the Court. We think this is a useful

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1 way to do it. In the event we have issues, maybe we would ask
2 that we be able to reach the Court or even come up with a
3 methodology among ourselves to try to fine-tune it. I think,
4 at the end of the day, if we go through it, not having the
5 Court with the supporting evidence in the order, so on behalf
6 of everyone else in the group, this is the one issue that I
7 think we can say we all agree.

8 MR. PANTAZIS: There might be a second one, but -- and
9 your Honor, I do need to mention that Jane McHart is an
10 attorney that we have retained to represent our interests.
11 Unfortunately, he had a prior commitment and couldn't be here,
12 but I did want the Court to know he will be filing and will be
13 representing us in the case. He's not a member of the Havlish
14 plaintiffs, he's an attorney representing the Havlish
15 plaintiffs.

16 THE COURT: Understood.

17 Just to be clear, the idea is, in 90 days, either you
18 will write me a letter saying you figured this all out or you
19 are going to send me a letter what you want to file or in 90
20 days you will make those filings?

21 MR. PANTAZIS: I think it's contemplated that in 90
22 days either the resolution or a roadmap of how to get to a
23 resolution.

24 THE COURT: So it's essentially a status letter.

25 MR. PANTAZIS: That's correct.

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1 What we are asking for is give us time since the order
2 was affirmed so that we can see what we can agree to. And we
3 may not be able to agree to everything, but we may be able to
4 agree to a process that may be helpful to the Court.

5 THE COURT: Great.

6 One, I think fairness and equity is going to control
7 this outcome. I hope everybody keeps that in mind. The amount
8 of money that was received, as I understand, is a significant
9 amount of money. So I want to make sure everyone is being
10 fair, but also reasonable, so that's one parting word to you
11 all.

12 The second is, if you think working with a judge to
13 settle this issue would be helpful -- maybe you don't want it
14 to be me, I'm happy to serve in that role, given I'm also going
15 to be deciding this, I understand you may not want me to do
16 it -- I'm happy to see if one of my colleagues could meet with
17 you all and maybe that meeting is in November or December, if
18 you schedule it now, to see whether or not settlement is
19 possible with the assistance of a mediator. So I want to make
20 that offer to you. If you want to think about it and get back
21 to me.

22 MR. PANTAZIS: Your Honor, on behalf of the Havlish
23 plaintiffs, we have thought about that and we would, I think,
24 appreciate that.

25 MR. MIGLIORI: I think the same, your Honor. We have

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1 actually talked about some folks, not knowing that the Court
2 would be amenable to helping us find someone. That's something
3 we have contemplated as probably useful and necessary.

4 THE COURT: So our rate is very reasonable.

5 MR. MIGLIORI: The ones we were talking about are not
6 necessarily as reasonable.

7 THE COURT: Why don't I see if a colleague might be
8 available, and think about like a Novemberish time frame, maybe
9 in between the Christmas and holiday season. December, people
10 are checking out already, but maybe that would be helpful. And
11 then so if we are having a status letter in 90 days, maybe do
12 this in 75 days.

13 MR. MIGLIORI: I think we plan to meet next week, on
14 the 13th, we may need to confer, I think we'll have an idea of
15 when we can.

16 MR. PANTAZIS: If you find a volunteer that's willing
17 to do it, it may be helpful if we reach out to him or her and
18 get them in the process of what they would like so that when we
19 do have a session with them in November it's fruitful rather
20 than start the process.

21 THE COURT: Hundred percent.

22 MR. GREEN: Justin Green, speaking for Ashton, Judge
23 Daniels gave us 30 days, which I think gives us until
24 September 30th. I think all the firms are planning a long
25 submission. I assume if you are going to give us 90 days, that

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1 deadline gets pushed.

2 THE COURT: Yes. I'm not aware that he set a
3 deadline, but in any event, the next deadline on this issue
4 will be the 90-day status letter to me. And I'm going to see
5 if I can find a perfect candidate to help you resolve this
6 issue in advance.

7 MR. MIGLIORI: Thank you, your Honor.

8 MR. PANTAZIS: Thank you, your Honor.

9 THE COURT: Anything further from anyone?

10 Before we adjourn, let me introduce Diljah Shaw, who
11 is my new courtroom deputy as of a week ago. Rachel, who you
12 all know and love and think is amazing, is running on to
13 greener pastures. Lucky for the public, those pastures remain
14 in the courthouse. She, like I say, will one day be my boss.
15 Rachel is moving on. Diljah is starting, today is her
16 introduction to you all. Thank you everybody for being so
17 gracious. And going forward, you will be hearing from her, I
18 just want to make sure you all know who that person is. Thank
19 you everybody.

20 (Adjourned)

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